



RAMZY P. LADAH, ESQ.

Nevada Bar No. 11405

CARL R. HOUSTON

Nevada Bar No. 11161

LADAH LAW FIRM

517 S. Third Street

Las Vegas, NV 89101

litigation@ladahlaw.com

T: 702.252.0055

F: 702.248.0055

Attorney for Plaintiffs

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

CLYDE MONTERO, an individual, AMY
MONTERO, an individual, J.V., an individual, I.V.,
an individual, and N.V., an individual,

Plaintiffs,

vs.

KNIGHT TRANSPORTATION, INC., an
Arizona corporation, KNIGHT REFRIGERATED,
LLC, an Arizona limited liability company, KNIGHT-
SWIFT TRANSPORTATION HOLDINGS, INC., an
Arizona corporation, KEVIN CORNISH, an
individual, DOES I through XX, and ROE
CORPORATIONS 1 through 100,

Defendants.

CASE NO.: 2:19-cv-02119-RFB-NJK

**STIPULATION FOR
CONTINUANCE OF TRIAL
DATE**

Plaintiffs, by and through their attorneys Ramzy P. Ladah and Carl R. Houston of the Ladah Law Firm, and Defendants Knight Transportation, Inc., Knight Refrigerated, LLC, and Kevin Cornish, by and through their attorneys, Jade N. Tran and Kyle J. Hoyt of Wood, Smith, Henning & Berman LLP, hereby stipulate to continue the trial date pursuant to LR 6-1, LR 7-1 and LCR 45. Specifically per LR 6-1, the parties have conferred and determined that they cannot proceed on the September 5, 2023 trial date for several reasons.

First, despite efforts to resolve these matters, Plaintiffs' counsel has no less than four trials before the end of the year, including but not limited to the following older/contemporaneous cases:



- 1 • 2017 state court case (Vallejo-Gascon v. Polanco: Case No. A-17-764166-C), which is a
2 three-week trial set for September 5, 2023
- 3 • 2019 state court case (Morales, et al. v. R&M Trucking: Case No. A-19-789743-C), which
4 is a 2–3-week trial on the October 9, 2023 trial stack
- 5 • 2019 state court case (Saber El-Bendary v. Cherry: Case No. A-19-804592-C), which will
6 be 2-3 weeks in September or October
- 7 • 2019 federal court case (Peters v. Knight Trucking, et al.: Case No. 2-19-cv-GMN-EJY),
8 which is also slated to go three weeks starting the week of 11/13.

9 Second, as the parties conferred regarding their respective case-in-chiefs—including their
10 prospective witness list—the estimated trial time is now 6-8 days.

11 Third, the parties have recently engaged in renewed discussions to settle this matter and
12 would like additional time to evaluate whether resolution is possible.

13 ///

14 ///

15 ///

16 ///

17 ///

18 ///

19 ///

20 ///

21 ///

22 ///

23 ///

24 ///

25 ///

26 ///

27 ///

28 ///

Accordingly, in light of the foregoing terms, the parties respectfully request an order continuing the September 5, 2023 trial setting and related dates to one of the following:

- 1) March 11, 2024
- 2) March 18, 2024
- 3) March 25, 2024
- 4) January 8, 2024

If the Court cannot accommodate any of the parties' proposed dates, the parties will make themselves available for any hearing this Court wants to schedule to discuss the same.

DATED this 28th day of July 2023.

DATED this 28th day of July 2023.

LADAH LAW FIRM

WOOD, SMITH, HENNING & BERMAN LLP

/s/ Ramzy P. Ladah

/s/ Kyle J. Hoyt

RAMZY P. LADAH, ESQ.

KYLE J. HOYT, ESQ.

Nevada Bar No. 11405

Nevada Bar No. 14886

CARL R. HOUSTON, ESQ.

JADE N. TRAN, ESQ.

Nevada Bar No. 11161

Admitted Pro Hac Vice

517 S. Third Street

2881 Business Park Court, Suite 200

Las Vegas, NV 89101

Las Vegas, Nevada 89128-9020

Attorneys for Plaintiffs

Attorneys for Knight Transportation, Inc., Knight Refrigerated, LLC, and Kevin Cornish

IT IS SO ORDERED. The Court resets the trial date to June 3, 2024 at 8:30 a.m.

with Calendar call 5/28/2024 at 1:30 p.m. An Order regarding trial shall re-issue at a later date.

Dated this 2nd day August 2023.


United States District Court Judge

